

Reges v. Cauce, et al.

**Exhibit Y
to Declaration of
Gabriel Walters**

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STUART REGES,)
Plaintiff,)
vs.) No. 2:22-cv-00964-JHC
ANA MARI CAUCE, et al.,)
Defendants.)

VIDEO-RECORDED DEPOSITION UPON ORAL EXAMINATION
OF
DAN GROSSMAN

8:59 a.m.
June 22, 2023
401 Union Street, Suite 3300
Seattle, Washington

Magna Legal Services
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REPORTED BY: Lauren G. Harty, RPR, CCR #2674

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2 ATTORNEY

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9 training for staff and faculty."

10 49 4/28/2023 "DEFENDANT DANIEL GROSSMAN'S

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11 RESPONSES TO PLAINTIFF'S FIRST SET OF
12 INTERROGATORIES."

13 50 Email chain ending 1/4/2022 from Dan

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16 51 Email chain ending 1/4/2022 from

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17 Magdalena Balazinska to Dan Grossman,
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19 52 1/4/2022 email from Magdalena Balazinska

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20 to Dan Grossman, UW_Reges_0002630-2631.

21 53 "Office of the University Registrar UW

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22 Syllabus Guidelines and Resources."

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1 or focused on you're taking this class from me. This
2 is what this class is about. This is how this works.
3 You know, it -- I -- I mean -- I'm trying to think
4 would there be any reason to sort of don't overlap in
5 some way with like, you know, I teach computer science
6 classes and I focus on the relevant matters at hand.

7 As I've told you, I have an inclusiveness
8 statement that I want everyone to feel that they
9 belong and to let me know if anything happens to the
10 contrary. I have a feedback mechanism, the required
11 stuff on based on religious.

12 But I think if you look at my course
13 syllabi, they are -- they are very focused on the
14 matter at -- at hand on -- on sort of all topics.

15 Q. Do you have an opinion on land
16 acknowledgment statements?

17 A. A --

18 MS. MCKENNA: Object to form.

19 A. Just like a personal opinion? Not as Vice
20 Director or professor or anything, just my personal
21 opinion on them?

22 Q. (By Mr. Diaz) Yes.

23 A. Yeah. After all this stuff I have -- I have
24 some opinion on them.

25 Q. What is your opinion --

1 A. I --

2 Q. -- of land acknowledgment statements?

3 A. I think they have some good intention of
4 wanting to provide some historical context and
5 recognizing that where we are as a university has some
6 connection to a very marginalized group in the -- in
7 the region -- right? -- if you will, if you focus on
8 the University of Washington.

9 But I'm not a big fan of putting this one
10 sentence everywhere. I think it becomes boilerplate.
11 I think history is complicated and it's hard to narrow
12 anything down to a sentence. And I think it's just
13 something that doesn't hurt or harm, right?

14 And so I think my opinion is pretty mild --
15 right? -- because I don't -- I -- I wouldn't say I
16 have a strong opinion about them, but I don't mind
17 them. I see them sometimes on-campus, as we've
18 discussed. I often don't see them. And I think that
19 they sort of, you know, don't help/don't hurt in terms
20 of -- but I -- I have some understanding of what they
21 are perhaps trying to accomplish, but my understanding
22 is -- is also somewhat limited.

23 Q. So it's your testimony that you're not a big
24 fan of land acknowledgments?

25 MS. MCKENNA: Object to form;

1 mischaracterizes testimony.

2 A. Let me -- let me clarify that a bit for you.
3 I think it makes sense that the University has one,
4 particularly given we're part of the state government
5 and the state's relationship with the sovereign
6 nations in the state of Washington and our desire to
7 educate everyone in the state, including members of
8 Native Americans.

9 So I -- I actually, my personal opinion --
10 this is not my job. I'm a computer science professor
11 and Vice Director. But my personal opinion is I think
12 it's good that the University has a land
13 acknowledgment statement and that that's part of who
14 the University is and how we serve the state and the
15 region and interface.

16 I'm less of a fan of, you know, land
17 acknowledgment statements appearing in lots of places
18 and on sort of unrelated presentations and documents.

19 Q. (By Mr. Diaz) And you said that that's
20 because you consider them boilerplate, history is
21 complicated, and it's hard to narrow things down to
22 one sentence, right?

23 A. Yeah. I'm not sure -- now, you -- that's an
24 accurate portrayal of what I said. I'm not quite sure
25 what I mean by boilerplate other than, you know --

1 you've already shown me a sentence that appears two or
2 three places, and people tend to use the same sentence
3 everywhere, so that's what I mean by that.

4 But I would say it's more that like, you
5 know, the relationship of the Native peoples to the
6 present culture and society and the region and the
7 whole history -- I mean, it's very com -- there's no
8 one sentence, right? There's -- I'm -- I'm sure -- I
9 would imagine that there are books and books and
10 studies and whatever about this whole thing.

11 And, you know, how that is enriched by a
12 one-sentence land acknowledgment, well, like I said, I
13 think there's some value there compared to sort of no
14 acknowledgment, but the value of, you know, sort of
15 frequent use of one sentence I'm -- is less clear to
16 me.

17 Q. Is there any other reason that you are not a
18 big fan of land acknowledgments that you haven't
19 mentioned already?

20 MS. MCKENNA: Object to form.

21 A. I'm trying to make sure that I'm sort of as
22 expansive as I can because I want to give you a sort
23 of truthful answer. I think that they're sometimes a
24 bit of a distraction or a bit of a wait. Now we're
25 talking about who used to live here? I thought the

1 topic of the meeting or the class was such and such.

2 So they're a little, you know -- I don't know.

3 They -- you know.

4 And -- and -- and I'll give you one more
5 reason, which is while I don't dislike them, some
6 people do, right? And so, you know, the same way I
7 think they can help with inclusiveness for some
8 people, they -- the -- you could imagine there's
9 some -- anything you say, if someone doesn't --
10 someone doesn't like a word or a phrase or whatever --
11 right? -- if -- if people don't like them, then --
12 then maybe it -- you know, there -- there's some --
13 you know, like I said, they don't really help. They
14 don't really hurt. We're now down into like the minor
15 things, but -- I guess that's maybe -- maybe an
16 additional small reason.

17 Q. (By Mr. Diaz) And -- is there any other
18 reason that you can think of at this time?

19 MS. MCKENNA: Object to form.

20 A. No. I mean, it's not -- I mean -- no. Not
21 that I can think of right now.

22 Q. (By Mr. Diaz) Have you ever discussed land
23 acknowledgment statements with Ed Lazowska?

24 A. Probably.

25 Q. Do you know Ed Lazowska's opinion of land

1 acknowledgment statements?

2 MS. MCKENNA: Object to form.

3 Q. (By Mr. Diaz) Let me rephrase.

4 Has -- has Ed Lazowska ever told you his
5 opinion of land acknowledgment statements?

6 A. I vaguely recall, yes. Well, I don't
7 know -- but I also don't know if he -- like if I saw
8 it or heard it in more of a group conversation or if
9 it was one-on-one. Like I don't recall exactly when,
10 but I've -- you know, and people's opinions can
11 change. Particularly his opinions can change, as
12 someone I know very well. But -- but I do recall
13 hearing some of his opinions or seeing -- hearing,
14 seeing, I'm not sure which -- some of his opinions on
15 land acknowledgments.

16 Q. And in whatever these communications were
17 what did he tell you?

18 A. Well, again, I'm not sure he ever told me
19 anything one-on-one. He might have. He might not. I
20 really don't recall. But my recollection of his
21 opinions of them is that he's, as -- to use the phrase
22 I used, not a fan.

23 Q. Did he tell you why he's not a fan?

24 MS. MCKENNA: Object to form.

25 A. Probably, but I don't remember the reason he

1 gave. It's probably in the space of what I said, a
2 distraction or -- you know. But I don't -- I don't --
3 I -- you know, I could maybe be reminded, but I
4 don't -- I don't remember offhand.

5 Q. (By Mr. Diaz) So in addition -- so you
6 are -- so are you aware of people that disagree with
7 the use of land acknowledgment statements generally?

8 MS. MCKENNA: Object to form.

9 A. Generally, yeah. You -- yes.

10 Q. (By Mr. Diaz) And -- are there any specific
11 people you have in mind?

12 MS. MCKENNA: Object to form.

13 A. No. I mean, when -- when I answered your
14 question I was just like sort of the general concept
15 is that -- that people think that like, you know,
16 it -- it's one more thing we're supposed to write
17 everywhere and say everywhere, right?

18 But -- you know, that's -- that's my -- I --
19 I really hesitate to answer that. That's sort of my
20 impression of the general people don't like them, but
21 I -- I -- you know, I can't -- I can't speak precisely
22 as to -- to why or maybe there's 50 different reasons.
23 I -- I've given you my personal opinion.

24 Q. (By Mr. Diaz) Do you recall Ed Lazowska ever
25 sharing an article about land acknowledgments with --

1 A. Yes.

2 MS. MCKENNA: Object to form.

3 Q. (By Mr. Diaz) Do you remember about when
4 that was?

5 A. Yes.

6 Q. And -- do you remember where the article was
7 written?

8 MS. MCKENNA: Object to form.

9 A. No. I have a couple guesses, but --

10 Q. (By Mr. Diaz) What's your -- what's your
11 best --

12 A. Like --

13 Q. -- guess?

14 A. -- The New Yorker, The Atlantic, kind of a
15 long-form periodical sort of.

16 Q. And did you read the article he shared?

17 A. I think so. At least -- at least skimmed
18 most of it. Probably read it. That's my
19 recollection.

20 Q. Do you remember the general topic?

21 MS. MCKENNA: Object to form.

22 A. Not well, but I could try to give you my
23 best recollection. My -- my vague recollection is the
24 article was moderately critical of them, saying --
25 boy. And I could have this wrong. I have not read

1 this article in, you know, a couple years. -- that
2 they kind of reduce it, the -- the -- the whole
3 complicated story of the relationship of Native
4 Americans to the other people who live here and the
5 relationship with the land and all that down to this
6 sort of -- sort of simple statement that doesn't
7 accomplish anything, and that if people are interested
8 in a real conversation about Native Americans and land
9 and what's now on that land and everything else, that
10 land acknowledgment statements are not really having
11 that conversation.

12 Q. (By Mr. Diaz) The -- as we said, the Allen
13 School's best practices for inclusive teaching
14 document says that faculty should consider including a
15 land acknowledgment statement in their syllabi, right?

16 A. Right.

17 Q. And the Allen School is a computer science
18 and engineering school, right?

19 A. Yes.

20 Q. How does a land acknowledgment statement
21 relate to the subject of computer science and
22 engineering?

23 MS. MCKENNA: Object to form.

24 A. Tenuously at best I would say. It -- it is
25 likely more related to the University educational

1 MS. MCKENNA: Object to form.

2 Q. (By Mr. Diaz) I'll rephrase.

3 A syllabus is something that students
4 will -- a syll -- a syllabus is something that
5 provides a good amount of information about a course
6 to students so they can progress through the course;
7 is that right?

8 A. Yes. It certainly has useful information to
9 students in order to set up a successful course for
10 them.

11 Q. And we've talked about obviously Professor
12 Reges put his version of a land acknowledgment
13 statement in his course syllabus, right?

14 A. Yes.

15 Q. And that statement, you know, you've said it
16 was offensive.

17 A. My -- my opinion, yes. It's -- it's -- it
18 was offensive and obnoxious.

19 Q. And obnoxious, right?

20 A. Yes.

21 Q. And I think we've talked about Professor
22 Reges -- Professor Reges' reasons, in your estimation,
23 for why he put it in the course syllabus, which
24 were -- which were what?

25 A. Yeah. This was -- this -- this is hard for

1 things and I'm not the University President who
2 recites it before events and things like this, but
3 I think in part it communicates the state's
4 relationship with the tribal communities and the
5 campus' relationship with Native Americans in -- in
6 this region in particular but also some historical
7 context that the University is aware that the land on
8 which it sits was not empty prior to the University.

9 Q. (By Mr. Diaz) And when Allen School
10 professors include the land acknowledgment statement
11 in their course syllabi they're doing that by choice,
12 right?

13 MS. MCKENNA: Object to form.

14 Q. (By Mr. Diaz) There's no requirement that
15 professors in the Allen School include a land
16 acknowledgment statement in their course syllabi --

17 A. Agreed.

18 Q. -- right?

19 In your view, do land acknowledgment
20 statements in course syllabi communicate approval of
21 land acknowledgments?

22 A. I mean, narrowly I would say yes, right? I
23 mean, you know, the -- as we've kind of walked through
24 together, it's the faculty member who prepared the
25 syllabus. If the faculty member chose to include

1 this, it -- you know, personally it -- it presumably
2 is -- you know, it -- it conveys a choice to do so and
3 why would one make that choice if you didn't approve
4 of them.

5 You'd have to ask the people who use them in
6 their syllabi. I -- I would -- I would stipulate that
7 they approve of using them in syllabi, but where would
8 they use them or not use them or they approve others
9 using them or not I'm not --

10 THE REPORTER: I'm sorry. Excuse me. One
11 second.

12 Sorry. Go ahead.

13 A. But, you know, there's always a context.
14 And I would hypothesize that people think they make --
15 you know, some people might think they make sense in
16 some contexts and not others.

17 Q. (By Mr. Diaz) And you agree that syllabi are
18 documents that communicate with students.

19 A. In general, yes. Absolutely, right? It's a
20 document prepared by the instructor for the students
21 in the class.

22 Q. And so when a professor includes a land
23 acknowledgment statement in their course syllabi they
24 are communicating their approval of land
25 acknowledgment statements in course syllabi.

1 MS. MCKENNA: Object to form.

2 Q. (By Mr. Diaz) Yes?

3 A. Yes.

4 Q. And Professor Reges, in your best
5 understanding, wanted to communicate a different view,
6 right?

7 MS. MCKENNA: Object to form.

8 A. Well, with -- without a clear understanding
9 of what that view is or how he was trying to
10 communicate it --

11 THE WITNESS: Oh. It's contagious.

12 A. -- yes. He was attempting -- I -- you're
13 really asking me to speculate what his intent was or
14 what I thought his intent was. So he was trying to
15 communicate a different viewpoint. It's not clear to
16 me he was trying to communicate it to the students as
17 opposed to, you know, people not in the -- you know,
18 the surrounding publicity or to his supervisors or
19 whomever. That's not --

20 Q. (By Mr. Diaz) Put --

21 A. -- clear.

22 Q. Putting aside Professor Reges' intent, he
23 did put his version of a land acknowledgment statement
24 in his course syllabus, right?

25 A. That is clear.

1 needed to tell us by a certain date and time. But
2 I -- I haven't looked at the -- at that email in, you
3 know, months or years.

4 Q. And so you wouldn't remember right now the
5 date of that email.

6 A. No. You know, we've talked a lot about
7 Tuesday, January 4th. It wasn't that day. Was it the
8 next day or the day after, it was sometime in there.

9 Q. If I gave you a copy of it, would it help
10 you?

11 A. Yeah.

12 (Marked Deposition Exhibit No. 54.)

13 Q. (By Mr. Diaz) You have in front of you
14 Exhibit 54, correct?

15 A. Correct.

16 Q. And on the first page of Exhibit 54 the
17 Bates stamp on the bottom right says UW_Reges_0005232,
18 correct?

19 A. Correct.

20 Q. Flipping to the second page --

21 A. Yes.

22 Q. -- do you see where it says on Friday,
23 January 7, 2022, 9:52 a.m.?

24 A. Yes.

25 Q. And next to that it says, "Magdalena

1 Balazinska," with her email address --

2 A. Uh-huh.

3 Q. -- "wrote:" Do you see that?

4 A. Yes.

5 Q. Why don't you take a moment to review that
6 email from 9:52 a.m., and then look up at me when
7 you're finished.

8 A. Okay.

9 Q. Earlier you referred to two emails that went
10 out to students from Director Balazinska, right?

11 A. Correct.

12 Q. And you said the -- the second of the two
13 emails was announcing the alternative section of 143,
14 correct?

15 A. Correct.

16 Q. Is this that email you were referring to?

17 A. I -- I trust that -- that it is. You know,
18 it look -- looks and sounds familiar. It would be
19 the -- you know, the -- the -- yes.

20 Q. Do you recall what you called this section?

21 A. We usually refer to it as CSE 143E. I --
22 I assume C and D were taken for bizarre bureaucratic
23 reasons.

24 Q. There's no meaning behind the E?

25 A. No. The 50-year-old software that runs the

1 That's not what students are used to.
2 Students are used to going to their own web portal and
3 dropping this class over here and adding this class
4 over there. But under the circumstances, honestly, we
5 needed to know how many people are we talking about
6 here? Is it 10? Is it 200? What -- what -- you
7 know, we -- we sent -- Magda sent this email Friday at
8 9:52 a.m., you know, and then we had to see how to
9 basically, you know, do it. Yeah.

10 Q. Do you remember how -- how many students
11 were in 143A and B total?

12 A. Not exactly.

13 Q. Approximate --

14 A. I'm going --

15 Q. -- number --

16 A. -- to say --

17 Q. -- is fine.

18 A. -- ballpark 500. Is that -- you know, I --
19 this -- this is sort of like a memory -- you know,
20 I --

21 Q. I won't hold you to it. It's --

22 A. Yeah.

23 Q. -- just --

24 A. It's --

25 Q. -- a ballpark.

1 A. Ballpark, 500.

2 Q. And do you recall roughly how many students
3 transferred to 143E?

4 A. You know, what I want to say, because it's a
5 number that, again, is truly not exact but in my head
6 is about 30 percent. And if my 500 is right, then
7 that would be about 150. And -- but I'm more
8 confident about the 30 percent than the 500.

9 Q. That's fine.

10 In terms of the -- the sections for 143E,
11 were those virtual or in person?

12 A. Those 24-person sections? Again, with
13 Omicron everything started virtual. I don't recall if
14 those transitioned back to in person in February. My
15 guess -- my guess would be yes. You know, when the --
16 you know, that would have -- there would have been
17 some discretion -- you know, there would have been
18 some -- you know, Hunter should have been able to make
19 that decision, more or less, and he would probably
20 remember.

21 Q. And -- but -- I'm just wondering, did the --
22 was the plan for the lectures --

23 A. Yeah.

24 Q. -- always to have the lectures be recorded
25 and -- and --

1 would drop, right? You know, because sometimes
2 students drop classes. It's part of college. And we
3 didn't prevent a student through the normal University
4 course registration mechanisms from registering for A
5 or B or E. Once we accomplished the creation of this
6 alternate section that weekend we used the normal
7 bureaucratic processes.

8 So in terms of did anyone add later, I --
9 I honestly don't know. My guess is a small num -- a
10 very small number would and the -- and -- but we could
11 track down that information.

12 Q. Why do you think students transferred from
13 143A/B to 143E?

14 MS. MCKENNA: Object to form.

15 A. I imagine, given there were roughly 150 of
16 them, that there isn't one reason that applies to all
17 of them. I think there was, as we've talked about, a
18 pretty big disruption in the first week of CSE 143.
19 There's a set of offended students, students who did
20 not like what was on the syllabus. And the fact that
21 they got an email from someone who wasn't in -- the
22 instructor, that first email that apologized for it
23 and so on, there were probably -- and so, you know,
24 that -- that's some chunk. What chunk of 150 we -- we
25 didn't ask and we don't know.

1 Beyond that, you know, students do, you
2 know, instructor shop to some extent. And, you know,
3 again, I don't -- you know, I know Professor Schafer
4 is a very popular professor, but, you know, Professor
5 Reges is also popular with, you know, some number of
6 students.

7 You know, honestly, maybe some liked the
8 synchronous Q&A -- right? -- versus the -- you know,
9 and -- and the video. We chose as sort of a pragmatic
10 matter as much as anything that -- you know, the
11 Google form didn't say why do you want to switch or,
12 you know, are you switching because of the learning
13 environment.

14 We said look, we're going to set it up. Out
15 of fairness, if we set up the alternate offering,
16 we'll email everyone in the class and make it
17 available, right? We're not going to -- there's not
18 going to be a -- you know, a bar to clear or a box to
19 check or a reason to give. So it -- it -- I would
20 have to speculate.

21 Q. (By Mr. Diaz) And after the section 143E was
22 announced did you receive any questions from students?

23 MS. MCKENNA: Object to form.

24 A. I think we received a few. And, again --
25 you know, we -- we already kind of read out the

1 email -- the email -- right? -- that, you know, who to
2 email with different kinds of questions. And I think
3 certainly across all of those there were I would guess
4 a couple dozen questions. I don't recall if I
5 received any specifically, but I probably received a
6 few.

7 You had me read the email from Said which,
8 very interestingly, like was sent to Magda, which was
9 the wrong place to send it, but she sort of helpfully
10 sent it on its way. So yeah, a couple dozen. I'm
11 guessing.

12 The -- you know, honestly, the undergrad
13 advisors, they process an enormous number of emails
14 from an enormous number of students. Part of me
15 wonders if they were sitting here if they would laugh
16 and say, "Two dozen? Are you kidding? We got a
17 hundred." I -- I just don't know.

18 Q. (By Mr. Diaz) Do you remember if Hunter
19 Schafer told you that he received lots of questions
20 from --

21 A. I --

22 Q. -- students?

23 A. -- don't remember.

24 MS. MCKENNA: Object to form.

25 A. I don't remember. I would -- well, to

1 answer your question, no, I don't remember if he told
2 me that. To go beyond, I'm sure he got some
3 questions. It -- it stands to reason.

4 In -- in fact, let -- let me qualify that.
5 I think -- because remember we added -- my -- my
6 recollection is we added that link from the Google
7 form to a document that attempted to answer questions
8 that we had gotten multiple times. And -- and I think
9 Hunter basically authored that document, if I recall
10 correctly, so that -- that speaks to him getting
11 questions. And we did -- we did that from a link from
12 the Google form so that we didn't have to email
13 everyone again, right? Yeah.

14 Q. (By Mr. Diaz) Makes sense.

15 A. Yeah.

16 Q. Make things easier for everybody, right?

17 A. Yeah.

18 MR. DIAZ: This is Fifty- --

19 THE REPORTER: Five.

20 MR. DIAZ: -- five.

21 (Marked Deposition Exhibit No. 55.)

22 MS. MCKENNA: Thank you.

23 Q. (By Mr. Diaz) Dr. Grossman, you have
24 Exhibit 55 in front of you?

25 A. Yes.

1 Q. And on the bottom right the Bates stamp is
2 UW_Reges_0005132?

3 A. Yes.

4 Q. And this is an email chain --

5 A. Okay.

6 Q. -- is that correct?

7 A. Yes.

8 Q. And turning to the -- the second page, to go
9 in reverse chron -- chronological order -- I find
10 that --

11 A. Yeah.

12 Q. -- simpler --

13 A. Yeah.

14 Q. -- do you see where it says January 7, 2022,
15 at 10:19 a.m.?

16 A. Yes.

17 Q. Oh. And do you see where it says January 7,
18 2022, at 10:16 a.m.?

19 A. Yes.

20 Q. And so this is within a half an hour of
21 Director Balazinska's announcement of the 143E
22 section, correct?

23 A. Yes.

24 Q. And the email is from a person named Aryan
25 Mahindra; is that correct?

1 A. I -- I don't know the student's name, but
2 yes. Yeah. I see that name there at the bottom.

3 Q. It's spelled --

4 A. Yeah.

5 Q. -- A-R-Y-A-N M-A-H-I-N-D-R-A?

6 A. Yes.

7 Q. Is it your belief that this was -- this is a
8 student?

9 A. Yes. I mean, I don't -- I have no idea, but
10 that's the sensible context. I don't know why a
11 non-student would be asking, but yeah.

12 Q. And based on this page of Exhibit 55 does it
13 appear that this -- this student emailed you?

14 A. I would have to -- I mean -- hmm. Let me
15 check whether it was --

16 Q. Let me rephrase that because --

17 A. Yeah.

18 Q. -- it's not --

19 A. I'm not --

20 Q. -- totally clear on the document --

21 A. I'm not sure. I'm -- I'm going to -- you
22 know, they could have emailed me and this Ugrad
23 advisor alias. It's a little -- yeah.

24 Q. You see your email at 10:19 a.m., right?

25 A. Yes, I do.

1 Q. And --

2 A. Yep.

3 Q. -- your email says -- and -- and -- and

4 it -- it's just above this email from Aryan --

5 A. Yeah.

6 Q. -- Mahindra.

7 A. Yeah.

8 Q. Your email says, "I'm adding Hunter since
9 this will be his decision," right?

10 A. Yes.

11 Q. Is it fair to assume that you were -- you
12 forwarded Aryan Mahindra's questions to Hunter
13 Schafer?

14 MS. MCKENNA: Object to form.

15 A. Yeah. I mean, this would be good to track
16 down, to the extent it matters, but it looks like,
17 checking a little further up, like I did like a Reply
18 All and added Hunter so the student would actually
19 still be on it would be my best guess. But it's a --
20 it's a little hard to tell from the printout.

21 Q. (By Mr. Diaz) And the email above yours on
22 1/7/2022 at 10:32 --

23 A. Uh-huh.

24 Q. -- is from Hunter Schafer? Yes?

25 A. Yes.

1 Q. The professor for 143E?

2 A. Yes.

3 Q. Can you read the first line of his email,
4 please?

5 A. "Yeah. I've been getting a lot of questions
6 about this. I just responded to a post on reddit
7 saying we are undecided."

8 Q. And I -- I should have had you read Aryan
9 Mahindra's questions, which started this email chain.
10 Would --

11 A. Sure.

12 Q. -- you mind doing that?

13 A. "What will be the new grading structure with
14 Professor Hunter? Will he allow resubmissions? Will
15 there be midterms in his class?"

16 Q. Turning to the first page of Exhibit 55 --

17 A. Uh-huh.

18 Q. -- do you see the -- where it says
19 January 7, 2022, at 10:48 a.m.?

20 A. Yes.

21 Q. And this email is at least signed by a
22 person named Jenifer Hig --

23 A. Higli.

24 Q. -- Higli?

25 A. Uh-huh. Yes.

1 Q. Who is Jenifer Higli?

2 A. Jenifer Higli is our Assistant Director for
3 Undergraduate -- she -- she's given me trouble in the
4 past for botching her official title. She is --
5 Crystal Eney, who we've discussed, is our Director of
6 all undergraduate student services in the Allen
7 School.

8 There are three teams that report up to
9 Crystal. One of them is academic advising, and Jen
10 leads and is a manager of that academic advising team.
11 She's going to laugh when I botched her title again.
12 Assistant Director of something. Sorry, Jen.
13 Senior -- senior is in her title.

14 Q. We all do our best.

15 And the first line of this email, can you
16 read that for me, please?

17 A. "Removing the student for a minute and
18 adding Crystal/Chloe -- we're getting a ton of grading
19 questions. Are we okay to tell students that we're
20 going to keep it the same as Stuart's original
21 structure, or do we need to think on it a bit more
22 still?"

23 Q. Based on this email chain --

24 A. Uh-huh.

25 Q. -- and your review of it --

1 A. Uh-huh.

2 Q. -- it sounds like there were a lot of, well,
3 grading questions pretty quick after the announcement
4 of 143E.

5 A. Yes. I would even say with a speed and
6 quantity that surprised us.

7 MR. DIAZ: This will be Exhibit 56.

8 (Marked Deposition Exhibit No. 56.)

9 Q. (By Mr. Diaz) Dr. Grossman, do you see
10 Exhibit 56 in front of you?

11 A. I do.

12 Q. And I will -- I will give you time to review
13 it.

14 A. Okay.

15 Q. Do you see the Bates stamp on the bottom
16 right says UW_Reges_0002570?

17 A. Yes.

18 Q. Why don't you take a moment to review it,
19 and then we can -- and just let me know when --

20 A. Okay.

21 Q. -- when you're finished.

22 A. Okay.

23 Q. Turning to the second to last page marked
24 Bates number 0002572, let me know --

25 A. Yes.

1 Q. -- when you're there.

2 A. I am there.

3 Q. Start with the final -- the last email -- or
4 the oldest email in the chain; January 7, 2022, at
5 2:16 p.m. Do you see that?

6 A. Yes.

7 Q. And that's an email you wrote.

8 A. Yes.

9 Q. And what -- generally speaking, what is
10 the -- what is this email about?

11 A. Yeah. Let me explain a little bit. So
12 clearly I'm letting this person, Miya Natsuhara, know
13 about the alternate offering. I wasn't sure that she
14 knew about it. And, you know, we had just announced
15 it, you know, a couple hours before, right?

16 Miya that quarter, and I had forgotten about
17 this, was teaching this class called 190Y, and
18 students in that class are freshmen who are part of
19 this program called STARTUP or have been identified in
20 some way. It's a workshop kind of alongside 143, CSE
21 143 -- we also do a version for other introductory
22 courses -- where they basically in a fairly small
23 group setting get additional practice, additional
24 advice. These are students that don't have the
25 academic preparation or study skills necessarily and

1 A. Natsuhara.

2 Q. -- Natsuhara.

3 A. Yeah.

4 Q. And he says, "Yes, that event was a large
5 part of why this was happening. The statement in his
6 syllabus was deeply offensive and many students feel
7 very uncomfortable in the class."

8 Professor Schafer's referring to Professor
9 Reges' inclusion of his land acknowledgment statement
10 here, right?

11 A. That's my understanding, right.

12 Q. And he's saying that event, in --

13 A. Yeah.

14 Q. -- inclusion of Professor Reges' land
15 acknowledgment statement in his course syllabus, was a
16 large part of why 143E is happening; is that right?

17 A. Yes. That's my reading of this. You know,
18 Miya in her message, which -- that he's responding to,
19 like links to something, right? The series of events
20 and there's a link, I don't know what that links to,
21 but I -- you know, your -- your understanding of the
22 context here agrees with mine.

23 Q. Going to the first page of Exhibit 56, there
24 is an email from you at 8:40 p.m. on January 7th,
25 2022. Do you see that?

1 context, right? The -- but the second email does not
2 give that context. Doesn't even refer to the first
3 email. Just gives the new information.

4 Q. And do you still feel that it would be
5 obvious to some, in your mind, that the two are --
6 that -- that the creation of the 143E course was
7 connected to the --

8 A. The disruption --

9 Q. -- Professor --

10 A. -- and the --

11 Q. -- Reges' --

12 A. Yes.

13 Q. -- land acknowledgment --

14 A. Yes.

15 Q. -- statement?

16 Let me -- let me -- let me get the question
17 out so we can make sure the --

18 A. My apologies.

19 Q. -- transcript's clear. I don't want either
20 of us to be garbled.

21 So do you still a -- do you agree
22 today that, to your knowledge, it was obvious to
23 some that 143E was created as a result of the land
24 acknowledgment in Stuart Reges' syllabus and the
25 resulting complaints that were received?

1 A. Yeah. We -- we could quibble over the, you
2 know, it was a response to the disruption versus the
3 complaints. Like we could -- we could quibble over
4 that wording. But yes. The fact that the creation of
5 the alternate section is related to the statement
6 being in the syllabus and the disruption that ensued
7 I think was obvious to I would speculate most and
8 certainly some.

9 Q. Turning to --

10 MR. DIAZ: So I just have a couple more
11 things. Can we take five minutes? And then I think
12 we'll be able to wrap up relatively quickly.

13 MS. MCKENNA: Sure.

14 THE WITNESS: Okay.

15 THE VIDEOGRAPHER: We're now going off the
16 record. The time is 3:26 p.m.

17 (Recess.)

18 THE VIDEOGRAPHER: We're now back on the
19 record. The time is 3:36 p.m.

20 Q. (By Mr. Diaz) Dr. Grossman, just a few more
21 questions I have for you.

22 We talked about the special investigating
23 committee earlier, right?

24 A. Yes.

25 Q. What is -- do you know what a special